

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD, ET
AL.

Defendants.

Case No. 2:24-CV-00627-JRG-RSP

**JOINT MOTION FOR EXTENSION OF TIME TO FILE PROPOSED
DOCKET CONTROL ORDER AND PROPOSED DISCOVERY ORDER**

Plaintiff Headwater Research LLC (“Headwater”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (together, “Samsung”) (collectively, “the Parties”) respectfully file this Joint Motion for Extension of Time to File Proposed Docket Control Order and Proposed Discovery Order and would show the Court as follows:

Pursuant to the Court’s Scheduling/Case Management Conference Order (“Order”) (Dkt. No. 24), the deadline for the Parties to file their Proposed Docket Control Order and Proposed Discovery Order is November 21, 2024. The Parties respectfully seek a five-day extension of time up to and including November 26, 2024, to file the Parties’ Proposed Docket Control Order and Proposed Discovery Order.

The Parties represent that good cause exists for this brief extension of time. The Parties are diligently meeting and conferring on the issues related to the Proposed Docket Control Order and Proposed Discovery Order, but the Parties need a brief additional time to continue to meet and confer to resolve their disputes. This brief extension will promote judicial efficiency because it will potentially reduce the expenditure of the Parties’ and Court’s limited judicial resources by

allowing the Parties adequate time to resolve their disputes prior to raising the issues with the Court.

The Parties represent that this extension is not sought for the purposes of delay but rather so that justice may be served. Counsel for Samsung met and conferred with counsel for Headwater. The Parties are jointly seeking the relief sought herein.

Accordingly, the Parties respectfully request that the Court grant this Joint Motion and enter an order extending the time in which the Parties are required to file their Proposed Docket Control Order and Proposed Discovery Order up to and including November 26, 2024.

Dated: November 21, 2024

Respectfully submitted,

/s/ Marc Fenster

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Attorney for Defendants
Samsung Electronics Co., Ltd. and
Samsung Electronics America, Inc.

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Samsung met and conferred with counsel for Headwater to discuss the substantive relief sought in this Motion pursuant to Local Rule CV-7(h). The Parties are jointly seeking the relief sought herein.

/s/ Melissa R. Smith
Melissa R. Smith

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on November 21, 2024.

/s/ Melissa R. Smith
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